

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION**

In the Matter of the Petition	
Of	
GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI,	Docket No. JKB 24-cv-941
And	<u>IN ADMIRALTY</u>
SYNERGY MARINE PTE LTD, as Manager of the M/V DALI,	
for Exoneration from or Limitation of Liability	

LOCAL RULE 104.7 CERTIFICATE OF CONFERENCE OF COUNSEL

Claimants, appearing herein through court-appointed lead counsel, do certify that on January 22, 2025, at 16:00 Eastern Standard Time, a meet-and-confer was held via Microsoft Teams between counsel for the Petitioners and counsel for the Lead Claimants. During this meet-and-confer, Messrs. Bennett and Belknap led discussions on behalf of the Petitioners and Messrs. Reisman and Jarrett led discussion on behalf of the Claimants.¹

During the meet-and-confer, the parties discussed a number of discovery disagreements. Some were compromised, others were not. One issue that could not be resolved was the location to be used when taking depositions of the Petitioners under Rule 30(b)(6) of the Federal Rules of Civil Procedure, as well as depositions of managerial employees of Synergy Marine Pte Ltd. Claimants want to take those depositions in the District of Maryland, where Petitioners chose to

¹ The following counsel participated in the meet-and-confer: David Reisman, R. Keith Jarrett, Jessie Shifalo, William Bennett, Thomas Belknap, Alan Weigel, Alexandra Clark, Emma Jones, Robert Hopkins, Laurie Furshman, Larry Walker, Robert Phelan, Diandra Debrosse, and Todd Lochner.

file suit. The Petitioners insist that the depositions take place overseas. Despite good faith, it is apparent that the parties cannot resolve this issue themselves.

Respectfully submitted this 4th day of February 2025,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of February 2025, a copy of the foregoing Joint Status Report was served via the court's CM/ECF system on all counsel of record.

/s/ David L. Reisman
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